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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
Fresno Division

THOMAS MATTHEWS, *individually and
on behalf of all others similarly situated,*

Plaintiff,

v.

RECKITT BENCKISER LLC and
RB HEALTH (US) LLC,

Defendants.

Case No. 1:20-CV-00854-NONE-EPG

**JOINT STIPULATION TO STAY THE
CASE**

WHEREAS, Defendants Reckitt Benckiser LLC and RB Health (US) LLC (“RB”) filed a Motion to Dismiss Plaintiff’s Amended Class Action Complaint (Dkt. 38, the “Motion”);

WHEREAS, Plaintiff’s opposition to the Motion is currently due January 8, 2021;

WHEREAS, Plaintiff’s case is one of three related class actions pending, the others being *Williams, et al. v. Reckitt Benckiser LLC, et al.*, 1:20-cv-23564 (S.D. Fla.) (the “Florida Action”), and *Angeles v. Reckitt Benckiser LLC, et al.*, 1:20-cv-07138 (S.D.N.Y.) (the “New York Action”);

WHEREAS, on October 2, 2020 and November 30, 2020, the parties participated in voluntary mediation sessions with Jill Sperber of Judicate West Alternative Dispute Resolution. Following these mediation sessions, the parties reached an agreement on all substantive terms of a

1 nationwide class settlement in the Florida Action, that will encompass all of the claims, parties, and
2 proposed class members in this Action, the New York Action, and the Florida Action;

3 **WHEREAS**, the parties are finalizing the Settlement Agreement and related documentation
4 that they anticipate executing and presenting for preliminary approval by the court in the Florida
5 Action by January 15, 2021, approval of which will result in the voluntary dismissal of this action
6 by Plaintiffs' counsel in furtherance of the class settlement;

7
8 **WHEREAS**, the parties jointly request a one hundred twenty (120) day stay in this action
9 to permit the completion and execution of the Settlement Agreement;

10 **IT IS HEREBY STIPULATED**, by and between Plaintiff and Defendants, by and through
11 their undersigned counsel of record, subject to the Court's approval, that the Court may enter its
12 order as follows:

13
14 1. The case, including Plaintiff's opposition to Defendants' Motion, the Initial
15 Scheduling Conference, and all other pending deadlines, is stayed for one hundred twenty (120)
16 days from the date of this Stipulation, until May 10, 2021, pending further order of the Court;

17 2. The Parties shall provide a status report to the Court in one hundred (100) days from
18 the date of this Stipulation, until April 19, 2021.

19
20 Dated: January 7, 2021

Respectfully submitted,

21 By: /s/Alex R. Straus
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